

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
CLERKS OFFICE

2004 JUN -4 P 1:31
DR. THOMAS M. EDSALL, and)
GRISEL EDSALL)
Plaintiffs) U.S. DISTRICT COURT
v.) DISTRICT OF MASS. civil Action
ASSUMPTION COLLEGE,) No. 04-40106-KMG
DR. THOMAS R. PLOUGH,)
DR. JOSEPH F. GOWER, and)
DR. JOHN F. McCLYMER)
Defendants)

PLAINTIFFS' MOTION TO PERMIT
COUNSEL TO APPEAR PRO HAC VICE

The Plaintiffs in this action, Dr. Thomas M Edsall and Grisel Edsall, through counsel, hereby request this Court to grant permission to Karim Kamal, Esq., to appear *pro hac vice* in this action to represent Plaintiffs in this matter. In support of this motion, counsel for Plaintiffs file herein an Affidavit of Karim Kamal ("Aff. Kamal") and, further state as follows:

1. Karim Kamal, Esq. is an attorney with an office located at 522 E. 85th Street, Apt. 4E New York, New York 10111.
2. Karim Kamal, is an attorney in good standing of the Bar of New York since 1993, and of the United States District Court for the Southern District of New York since 2001 (See Aff. Kamal, Par. 3).

FILING FEE PAID:
RECEIPT # 404339
AMOUNT \$ 50.00
BY DPTY CLK SJmms
DATE 6-9-04

3. There are no disciplinary proceedings, and have never been any disciplinary proceedings, pending against Attorney Kamal in any jurisdiction (See Aff. Kamal, Par. 5).

4. Karim Kamal is not a resident of the State of Massachusetts, regularly employed in the State of Massachusetts, nor regularly engaged in substantial business, professional, or other activities in the State of Massachusetts (See Aff. Kamal, Par. 2)

5. Attorney Kamal is familiar with Local Rules of the United States District Court of the District of Massachusetts (See Aff. Kamal, Par. 6).

6. James B. Krasnoo, Esq. and Paul J. Klehm, Esq., are members of the Bar for the United States District Court for the District of Massachusetts, and will at all times act as attorneys of record in this matter on behalf of Plaintiffs.

7. No prejudice to the Defendants will result from the allowance of this motion.

WHEREFORE, the Plaintiffs Dr. Thomas Edsall and Grisel Edsall requests that this Honorable Court grant Karim Kamal, Esq.,

permission to appear before this Court for the purposes of this case only.

Respectfully submitted,
Dr. Thomas M. Edsall and
Grisel Edsall
By Their Attorney,



Dated June 3, 2004

James B. Krasnoo BBO# 279300
Paul J. Klehm BBO # 561605
23 Main Street
Andover, MA 01810
(978) 475-995

CERTIFICATE OF SERVICE

I, Paul Klehm, hereby certify that the within document will be served upon Douglas Seaver, Esq., counsel to Defendants, via first class mail, postage prepaid on June 3, 2004.



Paul J. Klehm

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UNITED STATES DISTRICT COURT 2004 JUN -4 P 1:42
DISTRICT OF MASSACHUSETTS

U.S. DISTRICT COURT
DISTRICT OF MASS

DR. THOMAS M. EDSALL, an
individual,

Plaintiff,

v.

ASSUMPTION COLLEGE,
Corporation, KATE O'CONNOR, an
individual, and DOES 1 through
100,

Defendants.

AFFIDAVIT OF KARIM H. KAMAL
IN SUPPORT OF MOTION FOR LEAVE TO
APPEAR AND PRACTICE PRO HAC VICE
[Local Rules of Court, Rule
83.5.3]

I, KARIM H. KAMAL, ESQ., declare as follows:

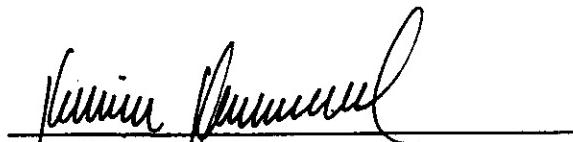
1. I am an attorney residing at 522 E. 85th Street, Apt. 4E, New York, New York 10028. My office address is 630 Fifth Avenue, Suite 3163, New York, NY 10111. I have personal knowledge of the facts contained herein and, if called upon, could and would testify competently thereto under oath.
2. I am not a resident of the State of Massachusetts, am not regularly employed in the State of Massachusetts, nor am I

regularly engaged in substantial business, professional, or other activities in the State of Massachusetts.

3. I am admitted to the New York State Bar, 1993; United States District Court, Northern District of New York, 2000; United States District Court, Southern District of New York, 2001.
4. I am a member in good standing of the above-mentioned courts.
5. I am not currently disbarred or suspended in any court, and there are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
6. I am familiar with the Local Rules of the United States District Court of the District of Massachusetts.

I declare under penalty of perjury of the laws of the State of Massachusetts that the foregoing is true and correct.

DATED: April 28, 2004



KARIM H. KAMAL
Attorney for Plaintiff
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